## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FREEDOM FROM RELIGION Civil Action No. 2:12-cv-01319

FOUNDATION, INC., DOE 1, BY DOE 1'S NEXT OF FRIEND AND PARENT, MARIE SCHAUB, WHO ALSO SUES ON

HER OWN BEHALF, DOE 2, BY DOE 2S NEXT OF FRIEND AND PARENT DOE 3. WHO ALSO SUES ON DOE'S OWN

BEHALF,

Plaintiffs,

VS.

NEW KENSINGTON-ARNOLD SCHOOL DISTRICT,

Defendant.

## **DEFENDANT'S MOTION TO EXCEED PAGE LIMITS**

Defendant, the New Kensington-Arnold School District, by and through its attorneys, Anthony G. Sanchez, Esquire, Amie A. Thompson, Esquire and the law firm of Andrews & Price, file the following Motion to Exceed Page Limits averring as follows:

- 1. Plaintiffs initiated this lawsuit with a Complaint filed on September 12, 2012.
- 2. Defendant waived service and a response is due November 16, 2012.
- 3. Defendant is prepared to file a Motion to Dismiss Pursuant to Rule 12(b)(6) and to Strike Pursuant to Rule 12(f) of the Federal Rules of Civil Procedure and a Brief in support thereof.
- 4. Defendant's brief exceeds the twenty-page limit prescribed by Local Rule CV-7(d)(3) and Rule II(b) of this Court's Practices and Procedures.
- Given the complexity of Plaintiffs' claims, this motion cannot be properly briefed 5. within the twenty (20) page limitation.

- 6. Defendant seeks leave to file a brief that does not exceed thirty (30) pages.
- 7. Defendant will be prejudiced if this request is not granted, as they will be denied the ability to adequately defend against the Plaintiffs' claims.

WHEREFORE, Defendant New Kensington-Arnold School District respectfully requests that this Honorable Court enter an Order granting Defendant permission to exceed the page limit.

Respectfully submitted, ANDREWS & PRICE

By: /s/ Anthony G. Sanchez, Esq.
Anthony G. Sanchez, Esq.
PA I.D. #55945

/s/ Amie A. Thompson, Esq. Amie A. Thompson, Esq. PA I.D. #309345

Firm #549 1500 Ardmore Boulevard, Suite 506 Pittsburgh, PA 15221 (412) 243-9700

Counsel for Defendant